

## ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

**Date/Time:** 10-28-04 / 11:00

**Site Contact(s):** Chris Gilbreath, Randy Leitner, David Ward  
**Phone:** 303-966-7355

**Regulatory Contact:** Steve Gunderson, Denise Onyskiw, David Kruchek, Harlan Ainscough  
**Phone:** 303-692-3367

**Agency:** CDPHE

**Purpose of Contact:** Closure of RCRA Unit 374.3, Room 3813

### Discussion

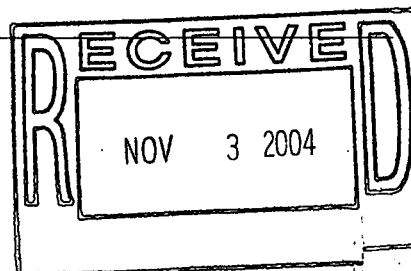
Part X of the Rocky Flats Environmental Technology Site's RCRA Part B Permit, addresses closure of permitted storage units. As stated in section X.A INTRODUCTION "Closure of permitted RCRA units will be completed on accordance with this permit or the RCRA unit will be closed pursuant to RFCA". The "Building 371/374 Closure Project Decommissioning Operations Plan" (DOP) is the RFCA decision document governing the closure of Unit 374.1 Room 3813. The DOP refers to the RSOP for Facility Component Removal, Size Reduction, & Decontamination Activities, a RFCA decision document, for closure options.

The RCRA storage unit 374.1 includes Room 3813 (East dock) which is described in the 371/374 DOP appendix B on page B-4. The unit will be closed by the method described in the RSOP for Facility Component Removal, Size Reduction, & Decontamination Activities 5.1.1 Clean Closure Option #1. The performance standard includes a review of the RCRA Operating record, building files, and other documentation to demonstrate that hazardous or mixed waste was never spilled in the unit, or that if a release did occur it was adequately cleaned up and decontaminated. Additionally, a visual inspection of the units confirms the absence of hazardous or mixed waste stains and/or residuals.

Unit 374.1, Room 3813 was originally permitted in 1997 to be used for storage of hazardous, low-level mixed (LLM), and transuranic mixed (TRM) waste. The EPA codes stored in this unit included: D001, D002, D004, D005, D006, D007, D008, D009, D010, D011, D022, D028, D029, D034, D035, D043, F001, F002, F003, F005, F006, F007, F009, P030, P098, P098, P099, P103, P106, P109, U003, U008, U103, U108, U154, U226, U239. Although this area historically managed liquid waste, secondary containment pans were required for storage of all containers managing liquid waste. As a conservative measure, all of the secondary containment pans were disposed of as mixed waste. Building 371 personnel's review of the unit's inspection records dating back to 2001, and the Site Spill Occurrence DataBase and ECATS dating back to 1997, indicate that there were never any spills and/or releases within this unit. These records will be made available for your review at the facility upon request. In addition, a visual inspection of Room 3813 by Building 371 personnel verified the absence of hazardous or mixed waste stains and/or residues. As a result, this unit is considered "clean closed" in accordance with Section 5.1.1 of the RSOP for Facility Component Removal, Size Reduction, & Decontamination Activities.

**Contact Record Prepared By:** Randy Leitner

Contact Record 4/10/00  
Rev. 5/24/04



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**Robbins, Jan**

**From:** Deck, Carol  
**Sent:** Wednesday, November 03, 2004 12:21 PM  
**To:** CERCLA AR  
**Subject:** FW: Contact Record Closure of Unit 374.1, Room 3813

Please include these emails with the Contact Record for this unit.

-----Original Message-----

**From:** Leitner, Randy  
**Sent:** Friday, October 29, 2004 9:24 AM  
**To:** Ainscough, Harlen; Onyskiw, Denise; #Contact Records; Ward, David  
**Subject:** RE: Contact Record Closure of Unit 374.1, Room 3813

Harlan,

As we discussed on the telephone today, ECATS and Site Spill Occurrence DataBase existed and were reviewed for the entire operational period of the unit.

Randy

-----Original Message-----

**From:** Ainscough, Harlen  
**Sent:** Friday, October 29, 2004 7:13 AM  
**To:** Onyskiw, Denise; #Contact Records; Ward, David; Leitner, Randy; Ainscough, Harlen  
**Subject:** Re: Contact Record Closure of Unit 374.1, Room 3813

Randy, the periods covered by inspection records and ECATs appears to be limited. What was the RCRA operational period, i.e., the A-Z time frame I noted in yesterday's conference call that the records must cover. Harlen